

Responsible for document: Johanna Hansson	Confidentiality class: Open
Approved by: Trond Fikseaunet	Revision number: A
Date for approval: 06-04-2010	Subject: Code of Conduct
Document ID/Path: QSSE 1003	Wulff Supplies

Code of Conduct Wulff Supplies

Environment, quality, health and safety – part of our everyday life

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Wulff Group/Wulff Supplies

Wulff-Group Plc. (Wulff) is a professional sales and marketing organisation for office supplies. Our vision is to be the most profitable and rapidly-expanding retailer of office supplies in the Nordic region. The company's task is to help our customers to succeed in their own core business by bringing them the products and services of tomorrow in the best way for them.

The head office for the Wulff Group is in Vantaa, Finland. The group has 24 subsidiaries in Finland, Sweden, Norway, Denmark, Estonia and Lithuania. Wulff is the market leader in Finland and is the third largest player on the Nordic market.

Wulff Supplies operates in Sweden, Norway and Denmark.

This code of conduct was adopted by the board of Wulff Supplies AB on 6 April 2010 and applies to Wulff Supplies AB and its subsidiaries. The code of conduct will be revised annually and any updates must always be approved by the board. "Wulff Supplies" refers here to all companies that are part of the Wulff Supplies group.

Wulff Supplies AB, Sweden, corporate ID number: 556694-9417

Wulff Supplies AS, Norway, corporate ID number: 993447773

Wulff Supplies AS, Denmark, corporate ID number: 31888034

Business concept

Wulff Supplies offers large and medium-sized customers on the Nordic market customised solutions for procurement of consumables.

Values and business principles

Wulff Supplies wishes to ensure that the products we offer to our customers and partners are manufactured according to ethically acceptable principles. This code of conduct specifies our minimum standard. The aim is to continuously improve the manufacturing environment and the working conditions from an ethical and social perspective. The code of conduct applies to all manufacturing units, warehouses, suppliers and subcontractors who manufacture and handle products on behalf of Wulff Supplies. The code defines the basic rights for employees and is based on the ILO Convention.

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Ethics and Morals

Wulff Supplies' concept of good business practice, honesty, integrity and responsibility must be maintained, and any involvement in bribes, extortion and corruption will not be tolerated in any form by Wulff Supplies.

Wulff Supplies will pursue its activities in accordance with applicable laws and ordinances and will also refrain from signing non-competition agreements.

Partnerships

Customers

It must be simple to be a customer of Wulff Supplies. We must do our utmost to ensure that customers perceive Wulff Supplies as a company they can rely on. Customer relationships must be based on business benefit.

We carry out systematic quality work and follow an internationally recognised quality management system, ISO 9001. We will take the initiative in dialogue with our customers when following up on how well we have managed to satisfy customer needs. Customer viewpoints will be treated as a source of improvements.

All sales and marketing of products or services must fulfil all agreed and legal norms in each country. Our marketing communications must be customer-oriented, support the business and create a positive image of the group.

Suppliers

Within the fields where Wulff Supplies has an influence, the group must strive to ensure that suppliers and subcontractors follow the relevant principles of this code of conduct.

Wulff Supplies will maintain suitable processes for assessing and selecting priority suppliers and partners.

We must continuously develop business relationships with our suppliers in order to create benefit for customers and availability for all users of our services.

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Products

Wulff Supplies chooses products that combine good environmental properties with the right level of quality. By structuring the choice of products and coordinating volumes together with key customers, environmental products are created that do not need to be more expensive than other products.

Wulff Supplies strives to ensure that it does not market products that contravene current environmental legislation on the markets where Wulff Supplies operates.

Employees

Freedom of association

Where local or applicable laws permit, all employees must have the right to form, join or refuse to join unions and be entitled to collective negotiations where they are employees of Wulff Supplies.

Forced labour and other forced work

No form of forced labour or other forced work will be tolerated by Wulff Supplies and all employees are entitled to terminate their employment in accordance with agreements or local laws.

Human rights and child labour

Wulff Supplies supports and respects international laws regarding human rights and thereby ensures that the company is not party to human rights abuses.

Wulff Supplies must not be party to any form of child labour or other forms of child exploitation. No person should be employed until after they have completed compulsory schooling or until age 15, and no person under the age of 18 is permitted to take part in risky work within Wulff Supplies.

Working environment and safety

Wulff Supplies will provide a working environment for all employees that is healthy, safe and in accordance with international norms and local laws. Individual checks will be carried out for all employees of Wulff Supplies at least once a year.

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Each employee must take responsibility for ensuring that work is carried out in a safe way, and must actively contribute to ensuring that our shared working environment is safe. Health work should consist of the following elements:

- promoting employee health
- preventing poor health and accidents
- rehabilitating employees during and after absences due to ill health

No employee may carry out work or remain in the workplace under the influence of alcohol and/or drugs. Employees with alcohol and/or drug-related problems are themselves responsible for seeking help, either privately or via the occupational health service. Each manager has responsibility for dealing with abuse-related issues in a humane way.

Discrimination

Diversity among Wulff Supplies' employees is a positive factor and no person should be treated differently due to race, skin colour, gender, sexual orientation, nationality, parental status, marital status, pregnancy, religion, political affiliation, ethnic background, social origin, social position, age, union membership or disability. Harassment, in the form of physical or psychological mistreatment, will not be tolerated within Wulff Supplies, nor will any form of threat.

Training plan

All employees must have the knowledge required to carry out their duties as assigned by Wulff Supplies. The need for training will be clarified in personal and annual employee reviews between the employee and their immediate manager. The content of this code of conduct is part of the induction programme for all new employees. The latest version can be downloaded and is available to all employees.

Environment

Sustainable development

Sustainable development is a key concept for Wulff Supplies and any waste of resources should be avoided as far as possible. Wulff Supplies supports innovative development of products and services that offer environmental benefits and promote greater environmental responsibility.

Wulff Supplies works towards resource-efficient use of materials, which involves better utilisation of materials and energy. Wulff Supplies also takes a preventive approach towards environmental challenges, and is working actively to ensure that current

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materials are gradually replaced by more environmentally-friendly ones, and that hazardous substances are avoided where suitable and more environmentally-friendly substances are available.

Environmental work is structured and follows an internationally-recognised environmental management system, ISO 14001. This places demands on both us and our suppliers/subcontractors.

Supplies Control

Supplies Control is Wulff Supplies' own concept in which we have combined all our environmental processes and set guidelines for the future. Supplies Control was implemented in spring 2009 with huge interest and commitment, demonstrated not just in dialogue with customers, but also through the involvement of suppliers and internal personnel. Thanks to Supplies Control, Wulff Supplies is taking the work further to include working actively on combining focused environmental work with total cost reduction throughout the product chain. We are therefore combining a strong market force for Wulff Supplies with social responsibility and a minimised burden on the environment.

Social commitment

Each individual company within the Wulff Supplies group will strive to establish good relationships in the local communities in which they are active. Business decisions that may be assumed to impact on society at large must, if possible, always be preceded by, or as soon as possible be followed by, discussions with society's representatives in order to identify any needs for common action.

The Wulff Supplies group will remain politically neutral and will not contribute direct funds to any political parties or candidates

Our sponsorship partnerships must benefit both the sponsored organisation and Wulff Supplies. Sponsorship grants may not be promised, offered or given to events organised by persons or organisations whose aims are incompatible with Wulff Supplies' code of conduct or which would damage Wulff Supplies' reputation.